

REMARKS

Reconsideration and allowance in view of the foregoing amendments and the following remarks are respectfully requested.

Rejection of Claims 1 – 20 Under 35 U.S.C. Section 103

The Examiner maintains the rejection of claims 1 – 20 under section 103 in view of Singhal over Hutson. Applicants submit further arguments in response to the Examiner’s comments in the Advisory Action. As shall be seen below, further arguments are now developed which add to the body of evidence against sufficient motivation to combine Singhal with Hutson.

Notably, the Examiner responds to Applicants arguments regarding the insufficient motivation or suggestion to combine Singhal with Hutson by asserting that Singhal teaches that “unrelated words can be present in the story and limits the expansion phase to only words proposed by the recognizer (p. 244, i.e., some words are “worthless”)...” Applicants traverse the obviousness analysis of the Examiner. In fact, Applicants submit that the information pointed out by the Examiner further supports the lack of motivation to combine.

For example, the Examiner pointing to p. 244 highlights the teachings of Singhal in which they teach in their lattice-based document expansion that because recognizers miss words and “add[] some spurious words to the spoken document” that the spurious words reduce the work-precision or the proportion of recognized words that were spoken. To solve the problem of word-precision reduction, Singhal teaches an approach “to add new words that ‘could have been there’ (words that were probably spoken but weren’t the top choice of a speech recognizer) to the automatic transcriptions of a spoken document.” They then discuss several techniques for “brining new words into a document. An obvious one from an IR perspective is document expansion using similar documents.... And from a speech recognition perspective, the obvious choice is to use word lattices which contain multiple

recognition hypotheses for any utterance.” Therefore, to solve a problem about poor word precision, Singhal teaches adding words to the document.

In contrast, the entire thrust of Hutson is to provide a system by which large volumes of textual data may be efficiently sorted and searched. As the Examiner notes in the Advisory Action, Hutson suggests that his teachings can improve access and that “the larger the database, the less likely a casual user is able to get the information he or she actually desires, at least not without considerable difficulty.” The Examiner characterizes this as Hutson teaching “that with larger databases the problem of worthless information can become more sever.” Now, Applicants respectfully submit that the Examiner has identified specific information that when considered for its suggestive power to support motivation to combine Singhal with Hutson, actually teaches away from such combination.

First, Singhal identifies a problem of reducing word-precision where spurious words are added to a document. The identified solution is to add more words and make the database even larger. In contrast, Hutson highlights problems in large databases, namely that the “larger the database, the less likely a casual user is able to get the information he or she actually desires....”

If the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims *prima facie* obvious. *In re Ratti*, 270 F.2d 810, 123 USPQ 349 (CCPA 1959). In this case, these two references cannot be blended without changing a fundamental principle of operation in each reference. For example, Singhal’s teaching of adding words to the database to make it larger is expressly criticized by Hutson as a negative feature of databases – that is they are too large.

We also note that the Examiner characterized Hutson as teaching “any removal of worthless information, as taught by Hutson, would still introduce some degree of improved efficiency.” Applicants traverse this characterization of Hutson because Hutson teaches

processing an existing database and enhancing certain data elements while suppressing others. Col. 2, lines 26 – 28, 43 – 46. Thus, it does not appear to Applicants that Hutson does teach “removal of worthless information” from a database rather there is a processing of information to aid in user searches. In this regard, the “removal of worthless information” that is taught by Hutson relates more to the search results and not the database. For example, Hutson states that “A user, therefore, is often inundated with large amounts of redundant and often worthless information.” Col. 1, lines 65 – 66. Singhal’s approach of adding words to the spoken document to enhance the word-precision will aid in more accurate information retrieval and provide the same benefit as that identified by the Examiner – which is to improve efficiency in user searches. The user in Singhal will therefore already experience a “removal of worthless information” as this concept is applied in Hutson in that the user will have more accurate search results and less “redundant” or “worthless” information.

Applicants respectfully submit that these arguments taken with Applicants earlier arguments further establish that by a preponderance of the evidence, one of skill in the art would not have sufficient motivation or suggestion to combine Singhal with Hutson.

Accordingly, Applicants continue to establish a gathering group of facts that prevent Singhal and Hutson from being combined under section 103. Applicants respectfully submit that claims 1 – 20 are patentable and in condition for allowance.

CONCLUSION

Having addressed all rejections, Applicants respectfully submit that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,

Date: March 2, 2006

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